## **EXHIBIT B**

## MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, Co-Chair Sean Carter, Co-Chair COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> Kreindler & Kreindler LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> Motley Rice LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA E-MAIL** 

June 17, 2022

Steven T. Cottreau, Esq. Gabrielle Pritsker, Esq. Jones Day 51 Louisiana Ave., N.W. Washington, D.C. 20001-2113

RE: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

## Dear Steve:

On behalf of plaintiffs with claims against Dubai Islamic Bank ("DIB"), enclosed please find Jonathan Winer's supplemental expert report, addressing certain evidence disclosed by the Central Intelligence Agency ("CIA") pursuant to Executive Order 14040, relating to DIB. Because the report supplements his earlier report, it does not reiterate items identified in FRCP 26 (a)(2)(B) that were set out in his initial report and remain unchanged.

As you know, plaintiffs have requested that DIB conduct supplemental searches in light of the information disclosed by the CIA, in accordance with its obligations under the Federal Rules. You had indicated that DIB would like to discuss plaintiffs' request for supplemental searches, in the hopes of reaching an agreed upon approach, but we have not heard further from you on that front. We had hoped that Mr. Winer would be in a position to address supplemental discovery materials produced by DIB at the same time he addressed the evidence released by the CIA, but given the Court's recent order and the fact that we have not heard further from you concerning the discovery issues, we are serving Mr. Winer's supplemental report at this time. Plaintiffs reserve their right to further supplement this report based on any new evidence, including additional materials produced by DIB.

Steven T. Cottreau June 17, 2022

We look forward to hearing further from you concerning the outstanding discovery issues in the near future.

Sincerely,

COZEN O'CONNOR

By: <u>/s/ Sean P. Carter</u>

Sean P. Carter COZEN O'CONNOR One Liberty Place 1650 Market Street, Suite 2800 Philadelphia, PA 19103 Tel.: (215) 665-2105

Email: scarter1@cozen.com

On behalf of the Plaintiffs' Exec. Committees

Cc: Alan Kabat, Esquire

LEGAL\58364593\1

MOTLEY RICE LLC

By: <u>/s/ Robert T. Haefele</u>

Robert T. Haefele MOTLEY RICE LLC 28 Bridgeside Boulevard Mount Pleasant, SC 29465 Tel.: (843) 216-9184

Email: rhaefele@motleyrice.com

On behalf of the Plaintiffs' Exec. Committees